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IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MICHAEL COREY JENKINS, et al.,

Plaintiffs,

Civil Action

vs.

No. 3:23-cv-374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, et al.,

Defendants.

DEPOSITION OF

STEVEN N. GODFREY

TAKEN ON  
MONDAY, NOVEMBER 11, 2024  
10:11 A.M.

578 HIGHLAND COLONY PARKWAY, SUITE 100  
RIDGELAND, MISSISSIPPI 39157

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98 to 101

<p style="text-align: right;">Page 98</p> <p>1 response when you read the New York Times article on</p> <p>2 the Rankin County deputies and the Goon Squad?</p> <p>3 MR. DARE: Same objection. You can</p> <p>4 answer.</p> <p>5 THE DEPONENT: I can answer? I was</p> <p>6 devastated.</p> <p>7 BY MR. SHABAZZ:</p> <p>8 Q. Okay. And why was that?</p> <p>9 A. I'm 71. I was 69 and 70 during that time.</p> <p>10 Opdyke, Elward and a couple of those kids were young</p> <p>11 enough to be my children. I trusted them, I loved</p> <p>12 them and they just broke my heart.</p> <p>13 Q. Okay. Well I mean -- were you shocked</p> <p>14 that all of this could have been occurring while you</p> <p>15 were in supervisory position in the department?</p> <p>16 A. Again, I didn't supervise them on the</p> <p>17 shift. Only on SRT operations. But it just was</p> <p>18 terrible.</p> <p>19 Q. Okay. But were you surprised this had</p> <p>20 been occurring in the Rankin Sheriff's Department?</p> <p>21 MR. DARE: Object to form.</p> <p>22 THE DEPONENT: I don't know how you</p> <p>23 couldn't be that.</p> <p>24 THE REPORTER: Will you repeat your</p> <p>25 answer?</p>	<p style="text-align: right;">Page 100</p> <p>1 that he does not have to provide any opinions if he</p> <p>2 does not so choose. I would also note that counsel</p> <p>3 knows that this is not an expert deposition.</p> <p>4 MR. SHABAZZ: I can ask about the article.</p> <p>5 BY MR. SHABAZZ:</p> <p>6 Q. Okay. So you said you were surprised?</p> <p>7 A. Absolutely.</p> <p>8 Q. Okay and --</p> <p>9 A. Disappointed's more the proper word,</p> <p>10 probably.</p> <p>11 Q. Why was that?</p> <p>12 A. I was disappointed in them. You just</p> <p>13 don't do those things.</p> <p>14 Q. Okay. Now were you surprised that -- well</p> <p>15 first of all, were you -- were you -- in the New</p> <p>16 York Times article, were you aware of any of the</p> <p>17 allegations that came out in that article?</p> <p>18 A. Yeah. What? I don't understand what</p> <p>19 you're asking now.</p> <p>20 Q. Outside of Michael Jenkins and Eddie</p> <p>21 Parker, that article named a number of incidents</p> <p>22 that have been alleged against Rankin County</p> <p>23 deputies over the years.</p> <p>24 A. I'm not -- I'm not personally familiar</p> <p>25 with them. I mean in the line of work we're in, you</p>
<p style="text-align: right;">Page 99</p> <p>1 THE DEPONENT: I don't know how you could</p> <p>2 not be surprised. I was devastated.</p> <p>3 MR. SHABAZZ: Okay. And if that was true,</p> <p>4 how could all of this have occurred if the Rankin</p> <p>5 County Sheriff's Department was being properly</p> <p>6 supervised?</p> <p>7 MR. DARE: Object to form. Now you're</p> <p>8 getting into absolute opinions. This witness is</p> <p>9 here to testify about facts. If you've got a</p> <p>10 question about facts going on at the time, you can</p> <p>11 ask it.</p> <p>12 MR. SHABAZZ: Oh, I can ask any -- I can</p> <p>13 ask.</p> <p>14 MR. DARE: This witness does not have to</p> <p>15 provide you any opinion.</p> <p>16 MR. SHABAZZ: You can make -- you can make</p> <p>17 your objection, but he can answer that question.</p> <p>18 MR. DARE: And I will say --</p> <p>19 MR. DARE: You've made your objection.</p> <p>20 Answer that question.</p> <p>21 THE REPORTER: One at a -- one at a time</p> <p>22 please, so I can report properly.</p> <p>23 MR. DARE: The witness does not have to</p> <p>24 provide any opinions. I am not instructing the</p> <p>25 witness not to answer, but I am objecting and saying</p>	<p style="text-align: right;">Page 101</p> <p>1 get a lot of allegations. Most people who end up</p> <p>2 going to jail have an allegation of innocence.</p> <p>3 Q. Right. But these were allegations of</p> <p>4 torture and abuse by Rankin deputies?</p> <p>5 A. I don't remember any torture and abuse</p> <p>6 allegations.</p> <p>7 Q. Do you remember that in the article?</p> <p>8 A. Basically, yes I read it.</p> <p>9 Q. Okay. So you -- even in the article,</p> <p>10 there were -- there were many things alleged against</p> <p>11 the deputies that are similar to what in the Jenkins</p> <p>12 and Parker?</p> <p>13 MR. DARE: Object to form.</p> <p>14 BY MR. SHABAZZ:</p> <p>15 Q. I mean, did you read that?</p> <p>16 A. I read the article, sir. Third time I've</p> <p>17 answered it.</p> <p>18 Q. Okay, and when you looked back at your</p> <p>19 position in the department, how do you -- how do you</p> <p>20 -- did you ask yourself how did I miss all of this</p> <p>21 while I was in the department?</p> <p>22 MR. DARE: Object to form. Same</p> <p>23 objection. Go ahead. I mean if you can answer, you</p> <p>24 can answer. Again, doesn't have to provide any</p> <p>25 opinions.</p>



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102 to 105

<p>1 MR. SHABAZZ: Okay.</p> <p>2 BY MR. SHABAZZ:</p> <p>3 Q. When you read that article, when you read</p> <p>4 that, did you look back and assess your own job</p> <p>5 performance?</p> <p>6 A. No, no. These guys knew what -- no.</p> <p>7 These guys what -- these guys knew what they did was</p> <p>8 wrong.</p> <p>9 Q. Okay. But how come you didn't find out?</p> <p>10 A. Because I didn't follow them around at</p> <p>11 night. Was not my job. I trusted these kids.</p> <p>12 Q. Okay. Did you supervise them properly?</p> <p>13 A. I was not their supervisor. Only on SRT</p> <p>14 operations did I manage them.</p> <p>15 Q. Okay. Did the Rankin County Sheriff's</p> <p>16 Department supervise them properly?</p> <p>17 MR. DARE: Object to form again. I think</p> <p>18 he's answered as to the facts as he knows them.</p> <p>19 MR. SHABAZZ: I got that. Objection</p> <p>20 noted. Did the Rankin County Sheriff's Department</p> <p>21 properly supervise these deputies?</p> <p>22 MR. DARE: And again, that's an opinion</p> <p>23 question that I -- I'm not going to instruct the</p> <p>24 witness not to answer, but he's not required to.</p> <p>25 BY MR. SHABAZZ:</p>	<p>Page 102</p> <p>1 in that article, how could those deputies have</p> <p>2 gotten away with what they got away with in that</p> <p>3 department?</p> <p>4 A. Sounds like they didn't get away with</p> <p>5 anything, I don't think.</p> <p>6 Q. Okay. But what about all the -- what</p> <p>7 about the numerous other allegations in that</p> <p>8 article?</p> <p>9 MR. DARE: That's not a question.</p> <p>10 THE DEPONENT: I'm not familiar with them.</p> <p>11 BY MR. SHABAZZ:</p> <p>12 Q. But you read the article, right?</p> <p>13 A. Fourth time, yes.</p> <p>14 Q. Okay. So I mean this is a simple</p> <p>15 question. I mean a simple question.</p> <p>16 A. I'm not familiar with the individual</p> <p>17 incidents. I cannot put a lot of stock in many</p> <p>18 allegations made against law enforcement in general.</p> <p>19 I was in law enforcement for 48 years. A lot of</p> <p>20 allegations.</p> <p>21 As you know as a defense counsel, one of</p> <p>22 the first things you do is take focus off of the</p> <p>23 defendant and put it on the law enforcement. So I'm</p> <p>24 a cop. I'm sorry.</p> <p>25 Q. Okay. So you said you don't take a lot of</p>
<p>Page 103</p> <p>1 Q. Sir, you have to answer the question sir.</p> <p>2 A. Ask the question.</p> <p>3 Q. Did the Rankin County Sheriff's Department</p> <p>4 properly supervise the deputies that you read about,</p> <p>5 that committed these alleged actions in that New</p> <p>6 York Times article that you read?</p> <p>7 MR. DARE: All right. So he can answer</p> <p>8 the question whether he did. You're asking him his</p> <p>9 opinion on whether Rankin County did anything else,</p> <p>10 even though he may not have knowledge of what's --</p> <p>11 other supervision. And that is why I'm repeatedly</p> <p>12 objecting here, because I don't think your question</p> <p>13 is proper. But again, I'm going to let -- I'm not --</p> <p>14 - I'm going to let him answer the question, even</p> <p>15 though it is improper and based off of hearsay.</p> <p>16 MR. SHABAZZ: I got you.</p> <p>17 BY MR. SHABAZZ:</p> <p>18 Q. Go right ahead, sir.</p> <p>19 A. I don't know.</p> <p>20 Q. I believe you do know. You were working</p> <p>21 there.</p> <p>22 MR. DARE: Asked and answered,</p> <p>23 argumentative. You don't have to answer again.</p> <p>24 BY MR. SHABAZZ:</p> <p>25 Q. How could -- if those allegations are true</p>	<p>Page 105</p> <p>1 stock in allegations against police officers? Is</p> <p>2 that what you said?</p> <p>3 A. They're always to me require further</p> <p>4 investigation.</p> <p>5 Q. Okay. All right. So the people that I'm</p> <p>6 talking about are in that article. That's why I</p> <p>7 asked, because when you said --</p> <p>8 A. Again, I don't know the specifics of each</p> <p>9 -- I have no knowledge of what happened, what the</p> <p>10 investigations found. It's the New York Times,</p> <p>11 boss.</p> <p>12 Q. I mean I understand that. But I just want</p> <p>13 to know were they part of these ten investigations?</p> <p>14 A. No. I've answered that at least a dozen</p> <p>15 times. No. I had no personal knowledge, nor did I</p> <p>16 investigate these incidents.</p> <p>17 Q. Well, you say you've investigated ten.</p> <p>18 You investigated ten.</p> <p>19 A. I said "maybe."</p> <p>20 Q. You say you can't even name the ten.</p> <p>21 A. Give me details.</p> <p>22 Q. I'm talking about which ten.</p> <p>23 MR. DARE: And I think he's answered the</p> <p>24 question to the best of your ability. He has</p> <p>25 answered the question now, I can't even tell you how</p>



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106 to 109

<p>1 many times. 2 BY MR. SHABAZZ: 3 Q. Well, sir. Let me just go down -- let me 4 just go down individual things, okay? Let me just 5 name -- let me just get an answer on the names, and 6 then -- 7 A. Haven't we done this once? 8 Q. No, we haven't. We have -- this is -- 9 we've only gotten part way through it. 10 MR. DARE: That's with the civil lawsuits. 11 THE DEPONENT: Oh, okay. 12 MR. SHABAZZ: I've gotten part way through 13 it. Okay. I just need to know, because I need to 14 know whether these were your investigations. Okay, 15 so I'm going to -- and they were in the article. 16 Okay so, Christopher Hopkins. 17 THE DEPONENT: I don't have a copy. 18 MR. DARE: Do you have a copy of the 19 article? 20 MR. SHABAZZ: I don't -- I don't know if I 21 need to belabor it. I mean I just want to know if 22 he's familiar with it. 23 THE DEPONENT: You're doing a pretty good 24 job of it, sir. 25 MR. DARE: Don't get into the back and</p>	<p>Page 106</p> <p>1 going to -- you take the deposition the way that you 2 want to take the deposition. But he did answer 3 before. None of the facts from the New York -- or 4 none of the allegations in the New York Times 5 article were familiar to him prior to reading the 6 article. And so I think that has generally been 7 answered. 8 MR. SHABAZZ: All right. Well -- 9 MR. DARE: But and if you want to go 10 through every last one of them and go through the 11 facts in every last one of them, feel free. 12 BY MR. SHABAZZ: 13 Q. Are you familiar with Robert Jones, the 14 allegations made against the Rankin County Sheriff's 15 Department that was contained in that article you 16 read? 17 A. No. Not just based on a name, no. 18 Q. Okay. Are you familiar with Fred Trimble, 19 who was in that article, who makes allegations 20 against Rankin County deputies? 21 MR. DARE: Can you spell the last name? 22 MR. WALKER: T-R-I-M-B-L-E. 23 MR. SHABAZZ: Trimble, T-R-I-M-B-L-E. 24 BY MR. SHABAZZ: 25 Q. And he makes allegations that he was</p>
<p>1 forth with him. Let's allow me to do that. 2 BY MR. SHABAZZ: 3 Q. All right. Just let me give you the name. 4 If it's no, it's no. If it's no, it's no. I'm not 5 going to belabor this deposition without describing 6 all of these incidents. 7 A. Sir, that's about the only way I can 8 remember them. But go ahead. 9 Q. All right. If you insist, okay. Okay. 10 MR. SHABAZZ: Trent Walker, can you do me 11 a favor? While I'm asking some other questions, can 12 you print out the New York Times article? 13 MR. WALKER: Not where I am. 14 MR. SHABAZZ: Can you just email it to 15 Jason there right now, and we just print it out? 16 MR. DARE: And we're going to read the 17 entire article again, and then go through that? 18 MR. SHABAZZ: I'm not trying to do that. 19 I'm trying to ask him, if you'll let me. Which I'm 20 going to do it anyway, ask you about the names and 21 if you don't -- you're not familiar, you're not 22 familiar. 23 THE DEPONENT: Go ahead. 24 MR. DARE: Well, you know, and I think he 25 answered the question before, and certainly I'm</p>	<p>Page 107</p> <p>1 abused Rankin deputies in July of 2018? 2 A. No. 3 Q. Okay. In June of 2018, Jerry Manning, M- 4 A-N-N-I-N-G, Elbert Lynch, L-Y-N-C-H, Gary Curro, C- 5 U-R-R-O and Adam Porter made allegations -- in that 6 article made allegations that they were abused by 7 Rankin County deputies in June of 2018? 8 A. Based on name alone, no. 9 Q. Okay. In that entire article, was there 10 anybody -- anything you read, were they part of any 11 of your investigations? 12 A. No. That's the best of my recollection. 13 Q. Okay. And does that include Carvis 14 Johnson, Carvis Johnson? 15 A. Not based on a name, sir. 16 Q. So could a Barry Yawn? 17 A. Nope. 18 Q. Mitchell Hobson? 19 A. Nope. 20 Q. Rick Loveday? 21 A. Nope. 22 Q. Robert Grozer, G-R-O-Z-E-R? 23 A. No. Nope. 24 Q. Maurice Porter? 25 A. No.</p>
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110 to 113

<p>Page 110</p> <p>1 Q. Okay. Jacoby Hopkins (phonetic)?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you ever have a chance to</p> <p>4 investigate Deputy Luke Stickman for any allegations</p> <p>5 of abuse?</p> <p>6 A. Not to my recollection.</p> <p>7 Q. Are you sure on Luke Stickman?</p> <p>8 A. Did I personally investigate Stickman?</p> <p>9 Q. Was he one of the ten cases you</p> <p>10 investigated?</p> <p>11 A. Not to the best of my knowledge.</p> <p>12 Q. Okay. What about Deputy James Rayborn</p> <p>13 (phonetic)? Are you familiar with him?</p> <p>14 A. Uh-huh.</p> <p>15 MR. DARE: You've got to answer yes or no.</p> <p>16 THE DEPONENT: Yes, yes.</p> <p>17 BY MR. SHABAZZ:</p> <p>18 Q. Rayborn. And did you ever have a chance</p> <p>19 to investigate him as one of your --</p> <p>20 A. One occasion. One occasion.</p> <p>21 Q. Okay. Could you tell me about that?</p> <p>22 A. That was an internal personnel matter</p> <p>23 involving some inappropriate comments he made in</p> <p>24 front of a dispatcher.</p> <p>25 Q. Okay. Could you tell me what happened?</p>	<p>Page 112</p> <p>1 the last year I was there. I don't think Poole's</p> <p>2 still there. I don't know.</p> <p>3 Q. Okay. But you never had -- he wasn't one</p> <p>4 of your investigations?</p> <p>5 A. No, sir.</p> <p>6 Q. Okay. Thornton. Did you ever have a</p> <p>7 chance to investigate Thornton?</p> <p>8 A. No, sir. That's the Undersheriff now.</p> <p>9 No, sir.</p> <p>10 Q. Okay. Did you ever investigate Bryan</p> <p>11 Bailey at any point for anything?</p> <p>12 A. No, sir.</p> <p>13 MR. DARE: And so making sure, counsel.</p> <p>14 If you're going through names from that article,</p> <p>15 you've got to be specific on the Thornton. Do you</p> <p>16 have a first name?</p> <p>17 BY MR. SHABAZZ:</p> <p>18 Q. Deputy Roger Chad Thornton.</p> <p>19 A. No, that's not Delo. I'm sorry. That's</p> <p>20 not Dwayne Thornton. No. I think he's a reserve</p> <p>21 officer, I think.</p> <p>22 Q. Chad Thornton was a reserve officer?</p> <p>23 A. I had very little to do with the reserves.</p> <p>24 Q. Okay. What about Deputy Fred Lovett?</p> <p>25 A. He's the Chief Investigator now. No, not</p>
<p>Page 111</p> <p>1 A. He was removed from the position and given</p> <p>2 -- given another one.</p> <p>3 Q. What did he say?</p> <p>4 MR. DARE: If you recall.</p> <p>5 BY MR. SHABAZZ:</p> <p>6 Q. What did he speak?</p> <p>7 A. Something along the lines in front of a</p> <p>8 female. Something of a sexual nature.</p> <p>9 Q. Okay. I mean and when you investigated</p> <p>10 him, what happened?</p> <p>11 A. He was removed from the position.</p> <p>12 Q. And was this the result of your making a</p> <p>13 finding in your investigation?</p> <p>14 A. I don't make findings, sir. I just</p> <p>15 present the facts. The Sheriff makes the findings.</p> <p>16 Q. Okay. So you -- the Sheriff removed him</p> <p>17 in this -- from his position, based on your</p> <p>18 investigation?</p> <p>19 A. I assume so.</p> <p>20 Q. Okay. What about Cody Grogan?</p> <p>21 A. I did not do any investigations against --</p> <p>22 to my knowledge with Cody.</p> <p>23 Q. What about Deputy Kevin Poole?</p> <p>24 A. No. Poole left shortly after I started.</p> <p>25 Then he came back for a short period of time, maybe</p>	<p>Page 113</p> <p>1 to my knowledge.</p> <p>2 Q. Okay. Now when you did your interviews</p> <p>3 after the Jenkins-Parker incident, did you -- did</p> <p>4 you interview Officer Hartsfield from Richland?</p> <p>5 A. No, sir.</p> <p>6 Q. Okay. Just taking you back for a minute.</p> <p>7 In January 2023 in the Sheriff's Department, was</p> <p>8 there a Compliance Division at that time?</p> <p>9 A. No, sir.</p> <p>10 Q. Okay. That came later?</p> <p>11 A. About the time I left, yes sir. They were</p> <p>12 in the process of putting it together when I left.</p> <p>13 I asked -- in fact was asked if I wanted to be the</p> <p>14 compliance officer, and I declined.</p> <p>15 Q. Okay. So what role did you play in the</p> <p>16 restructuring of the department?</p> <p>17 A. None.</p> <p>18 Q. But you were asked to be part of the new</p> <p>19 structure?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And who -- who was involved in the</p> <p>22 restructuring of the department?</p> <p>23 MR. DARE: Object to form.</p> <p>24 THE DEPONENT: I would assume the Sheriff.</p> <p>25 BY MR. SHABAZZ:</p>



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114 to 117

<p>Page 114</p> <p>1 Q. Anyone else?</p> <p>2 A. No. That would just be speculation on my</p> <p>3 part.</p> <p>4 Q. Okay. Did the Department of Justice --</p> <p>5 did the Department of Justice interview you in</p> <p>6 regards to the operations of the Rankin County</p> <p>7 Sheriff's Department?</p> <p>8 A. This is the first deposition or interview</p> <p>9 I have been involved in concerning the Rankin County</p> <p>10 Sheriff's Office.</p> <p>11 Q. Okay. Now in January 2023, you were --</p> <p>12 you said you were over training. Does that mean you</p> <p>13 were over the Training Division?</p> <p>14 A. There is no division, sir. It was me.</p> <p>15 Q. Okay. So you were the one man in charge</p> <p>16 of all training?</p> <p>17 A. Again, I maintained the records.</p> <p>18 Q. You maintained the records. Now in terms</p> <p>19 of the -- I just want to get clear. In terms of</p> <p>20 excessive force, was there a specific training</p> <p>21 mandate for the deputies to be trained on -- on the</p> <p>22 proper use of force?</p> <p>23 A. We asked them to take a couple of course</p> <p>24 on Virtual Academy, and I don't remember any one</p> <p>25 particularly named excessive force. But there were</p>	<p>Page 116</p> <p>1 A. Not to my recollection.</p> <p>2 Q. Okay. And in terms of a citizen being</p> <p>3 able to make a complaint against Rankin County</p> <p>4 Sheriff's Department, what do you know about that</p> <p>5 procedure?</p> <p>6 A. Some would call in and leave a message</p> <p>7 with the Sheriff or talk to the Sheriff or the Chief</p> <p>8 Investigator or whatever, or the Chief of Patrol.</p> <p>9 They might walk in and talk to the duty deputy, and</p> <p>10 that would be passed onto the person that was</p> <p>11 supervising.</p> <p>12 Q. Okay. So you're saying that these</p> <p>13 complaints were taken orally?</p> <p>14 A. Some.</p> <p>15 Q. Okay. And the ones that were not taken</p> <p>16 orally, what was the procedure?</p> <p>17 A. That I'm not familiar with a written</p> <p>18 protocol or written procedure of how to handle</p> <p>19 complaints against the Sheriff's Office.</p> <p>20 Q. So are you saying that Rankin County did</p> <p>21 not have a written procedure for filing citizen</p> <p>22 complaints?</p> <p>23 A. No, sir. I said I was not familiar with</p> <p>24 one.</p> <p>25 Q. Okay. You're not familiar -- you're not</p>
<p>Page 115</p> <p>1 some involving civil rights and stuff along those</p> <p>2 lines.</p> <p>3 Q. Did you -- you asked them to take this</p> <p>4 course?</p> <p>5 A. They were assigned to take the course, yes</p> <p>6 sir.</p> <p>7 Q. Every deputy?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Okay. What was that training about?</p> <p>10 A. I'm sorry. What was that?</p> <p>11 Q. What was the name of that training you</p> <p>12 were --</p> <p>13 A. I can't -- I can't recall the specific</p> <p>14 name of it right now. I have to look at the Virtual</p> <p>15 Academy roll sheet.</p> <p>16 Q. And what was the --</p> <p>17 A. They should be able to provide that. They</p> <p>18 should be able to provide that to you.</p> <p>19 Q. Okay. What was the description? Help me</p> <p>20 out with the description of the training.</p> <p>21 A. Sir, I don't remember. That's four years</p> <p>22 ago, close to four years ago, three years ago.</p> <p>23 Q. Okay. Other than that, any other specific</p> <p>24 trainings that were -- that were mandated by Rankin</p> <p>25 County that deal with the use of force?</p>	<p>Page 117</p> <p>1 familiar with one?</p> <p>2 A. That's what I said, yes sir.</p> <p>3 Q. Did the department have one?</p> <p>4 A. If I'm not familiar with one, how can I</p> <p>5 attempt to find that, sir? I don't -- again, I am</p> <p>6 not familiar with one.</p> <p>7 Q. Okay. But I mean you would be familiar if</p> <p>8 they had one; correct?</p> <p>9 A. Not necessarily.</p> <p>10 Q. And I'm trying to get clear. Now you said</p> <p>11 the other training you mentioned was a civil rights</p> <p>12 training? It had a civil rights aspect to it?</p> <p>13 A. Yeah.</p> <p>14 Q. Okay. Could you explain that training?</p> <p>15 A. I didn't attend it.</p> <p>16 Q. Do you know what it was about and what it</p> <p>17 consisted of?</p> <p>18 A. Jeff Artis -- Jeff Artis, a retired FBI</p> <p>19 agent, I'm pretty sure you're probably familiar with</p> <p>20 him, did a Color of Law school or class a couple of</p> <p>21 days long.</p> <p>22 Q. When was -- when did that take place?</p> <p>23 A. I don't -- I don't remember.</p> <p>24 Q. I mean was it before the Jenkins and</p> <p>25 Parker incident?</p>



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118 to 121

<p>Page 118</p> <p>1 A. I think so. I know he provided some 2 training afterwards also, but I was not there for 3 that. 4 Q. You say "before." Do you know when about 5 he did that beforehand? 6 A. No, sir. 7 Q. Did it happen before? 8 A. I think so. 9 Q. But you're not sure? 10 A. I'm not sure. 11 Q. You have records? You have records? 12 A. I do not. I do not. No, sir. 13 Q. Okay. Let me ask you just in this -- I'm 14 trying to get a -- just a bare idea of the structure 15 of the department that you were a part of. If 16 someone issued a complaint, if somebody complained 17 about Christian Dedmon, somebody had complained at 18 Christian Dedmon, is it true that that complaint 19 would be passed on to Brett McAlpin? 20 A. Probably. I would think so. 21 Q. Okay. And what was Brett McAlpin's job? 22 A. What was his what, sir? 23 Q. Brett McAlpin's job, yes. 24 A. He was the Chief Investigator at the time 25 of this incident.</p>	<p>Page 120</p> <p>1 reported directly to Bryan Bailey? 2 A. Oh, yes sir, and the Undersheriff, of 3 course. 4 Q. Okay. And how did he report to them? 5 A. I can't answer that. 6 Q. Well, how do you know he reported to Bryan 7 Bailey? 8 A. Because Bryan Bailey's the Sheriff. 9 Q. But how do you know that happened? 10 A. I don't. If you want to get specific, I 11 don't know. I've seen them conversation on many 12 occasions talking about cases. 13 Q. Okay. Now was Brett McAlpin responsible 14 for training the investigators or just supervising 15 them? Did he conduct any training of investigators 16 or he just supervised them? 17 A. Not to my knowledge. 18 Q. Okay. All right. Give me one second. I 19 don't have too much more. And what changes did the 20 Rankin County Sheriff's Department implement after 21 Jenkins and Parker incident? What changes did the - 22 - 23 A. That's a little broad, sir. You might be 24 more specific than that. Yeah. I left in -- 25 actually I left --</p>
<p>Page 119</p> <p>1 Q. And what did that -- what did that mean? 2 What was the -- 3 A. He supervised investigators. 4 Q. Okay. Could you give me further 5 description of how he -- how he supervised the 6 investigators? 7 A. They had a meeting every day, passed out 8 their cases to be assigned. I guess he liaised 9 with any questions that might have come in about 10 investigations that the individual investigator 11 couldn't handle and -- 12 Q. Which investigators did he supervise? 13 A. Sir? 14 Q. Which investigators did Brett McAlpin 15 supervise? 16 A. All of them. 17 Q. Okay. When you say "all," can you tell me 18 who you mean? 19 A. I don't have a list of employees there, 20 sir. And again that fluctuated -- 21 Q. Not their names. Not their names, but 22 their titles? 23 A. Investigator. 24 Q. Okay. So Brett McAlpin supervised all the 25 investigators. How often did Brett McAlpin, he</p>	<p>Page 121</p> <p>1 Q. What training -- I understand. 2 A. Oh. 3 Q. Okay. Between January of 2023 and when 4 you left in October, what specific changes did the 5 Rankin County Sheriff's Department make in terms of 6 its operations, as it pertains to civil rights? 7 A. None to my knowledge. I don't -- I don't 8 really know how you would change your operating 9 procedures in relation to civil rights. I mean 10 civil rights are civil rights. You go by the law. 11 Q. Okay. But something major occurred within 12 the department that -- 13 A. Very true. 14 Q. Did Rankin make any changes? Did they 15 make any changes? 16 A. No, not that I can think of. 17 Q. Okay. Well, was the Internal Affairs 18 Department established after you left or before? 19 A. Yeah. Right before I left, they had a new 20 investigator. He was -- an investigator from 21 another agency came, and they started assigning them 22 to him. 23 Q. Was he in -- was that the beginning of the 24 Internal Affairs Department? I mean, pardon. Yes. 25 Was that the beginning of the Internal Affairs</p>



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122 to 125

<p style="text-align: right;">Page 122</p> <p>1 Department of Rankin County?</p> <p>2 A. I don't know. I would guess it would be,</p> <p>3 but I don't know.</p> <p>4 Q. Okay. But that would be the first time</p> <p>5 that an IAD, Internal Affairs Department, had been</p> <p>6 established?</p> <p>7 A. Again, I don't know. I would assume so.</p> <p>8 Q. Okay. Do you know in January of 2023</p> <p>9 about how many investigators were there in the</p> <p>10 Rankin Sheriff's Department? Do you know?</p> <p>11 A. Are you counting -- seven-eight maybe. I</p> <p>12 don't know. It depends on whether you --</p> <p>13 Q. Okay.</p> <p>14 A. That's just -- again, that's a WAG.</p> <p>15 Q. Okay. And they were supervised by</p> <p>16 McAlpin?</p> <p>17 A. At that time, yes sir.</p> <p>18 Q. Okay. And they're classified -- those</p> <p>19 investigators are classified different than</p> <p>20 deputies, is that right?</p> <p>21 A. I don't understand that. Everybody's a</p> <p>22 deputy. Investigators are a title.</p> <p>23 Q. Okay. And everybody's a deputy and some</p> <p>24 are investigators? Okay.</p> <p>25 A. Right. That's a title. That's a job</p>	<p style="text-align: right;">Page 124</p> <p>1 -- he would do a download from their taser, attach</p> <p>2 the download data to the use of force report.</p> <p>3 Q. Okay. Who was responsible for determining</p> <p>4 -- determining whether those tasers had been used</p> <p>5 appropriately?</p> <p>6 A. I would assume it would be Chief of Patrol</p> <p>7 and in counsel with the Undersheriff and the</p> <p>8 Sheriff.</p> <p>9 Q. The Undersheriff and the Sheriff were</p> <p>10 responsible for determining whether that taser had</p> <p>11 been used correctly?</p> <p>12 A. Ultimately, it's always the Sheriff's</p> <p>13 decision. I don't really know who's included. I</p> <p>14 mean he may ask two or three people. I don't know.</p> <p>15 Q. But ultimately, that rests on the -- it</p> <p>16 comes to the Sheriff; correct?</p> <p>17 A. He is the Sheriff.</p> <p>18 Q. Ultimately then, the Sheriff would receive</p> <p>19 these taser reports?</p> <p>20 A. I'm assuming.</p> <p>21 Q. Okay. And what about firearm use? Whose</p> <p>22 responsibility was it to determine whether a firearm</p> <p>23 had been used appropriately?</p> <p>24 A. Again, that would additionally be the</p> <p>25 Sheriff.</p>
<p style="text-align: right;">Page 123</p> <p>1 title.</p> <p>2 Q. Okay. One second.</p> <p>3 A. Yes, sir.</p> <p>4 Q. Do you know who was in -- whose</p> <p>5 responsibility it was to determine if taser use was</p> <p>6 a -- was justified in the Rankin County Sheriff's</p> <p>7 Department? Whose responsibility was that, to</p> <p>8 determine what the deputies' taser use was?</p> <p>9 A. You were -- to the best of my knowledge,</p> <p>10 because I'm not taser-certified or dealt with them,</p> <p>11 but if a deputy had a taser download, I'm sorry.</p> <p>12 The taser use, because you have downloads</p> <p>13 without usage, he would come in and tell -- there</p> <p>14 should be a use of force report. It came with a</p> <p>15 taser usage, and then it would go to the Chief of</p> <p>16 Patrol and they would download it, and then it would</p> <p>17 logged and attached to the use of force report.</p> <p>18 I didn't participate in this. I've</p> <p>19 witnessed them doing it, simply because their</p> <p>20 offices was right next to mine. But that was just</p> <p>21 kind of what I inferred.</p> <p>22 Q. Okay. So you say that the Chief of Patrol</p> <p>23 was -- was the person that would be responsible for</p> <p>24 collecting the taser use reports?</p> <p>25 A. He would -- yes. There again, they would</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. Okay. Okay. So like for example in the</p> <p>2 case of Mr. Schmidt, where it's a fact that the</p> <p>3 firearm was discharged in the course of interactions</p> <p>4 with Mr. Allen Schmidt. Would Bryan Bailey be</p> <p>5 notified that that firearm had been used?</p> <p>6 MR. DARE: Object to form.</p> <p>7 THE DEPONENT: I don't --</p> <p>8 MR. SHABAZZ: Would Bryan Bailey know that</p> <p>9 a deputy had used that -- discharged his firearm as</p> <p>10 in the case of Mr. Schmidt?</p> <p>11 MR. DARE: My objection was just that it</p> <p>12 was a fact that it had been discharged. But I mean</p> <p>13 if you know, you can answer.</p> <p>14 THE DEPONENT: From what I can deduct, I</p> <p>15 don't think it was ever reported as a discharge, was</p> <p>16 it?</p> <p>17 BY MR. SHABAZZ:</p> <p>18 Q. I'm asking you.</p> <p>19 A. I'm telling you. I don't think it was</p> <p>20 ever reported.</p> <p>21 Q. Okay. Well, you say that all discharges</p> <p>22 are reported; correct?</p> <p>23 A. They're supposed to be.</p> <p>24 Q. Okay. Well, what is the system to -- to</p> <p>25 know whether or not a deputy has discharged their</p>



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1 firearm? Is there a system in place?

2 A. I don't know how you would do that, unless

3 you counted their ammo every day when they went on

4 shift, and counted it every day when they went off

5 shift, and then check their car and see if they had

6 extra ammo every day. You kind of have to trust

7 your people.

8 Q. Okay. So what are you saying? You're

9 saying that -- what are you saying when you say

10 that?

11 A. I don't -- I don't know if any department

12 that has the ability to do that.

13 Q. Okay. But you said that -- did you say

14 that Sheriff Bailey would be aware of all firearm

15 discharges?

16 A. If they are reported.

17 Q. Okay. Indulge me one second. And a gun

18 discharge, does a gun discharge constitute the use

19 of force?

20 A. Not necessarily.

21 Q. Okay. Can you explain that? Why wouldn't

22 it?

23 A. If you're at home playing with your

24 firearm and you shoot your television, that's not a

25 use of force.

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1 Q. Well, I'm talking about in the line of

2 duty. Discharge of firearm in the line of duty. Is

3 that considered the use of force?

4 A. It certainly should be.

5 Q. Okay. And did Rankin County have in place

6 any policies or procedures that monitored the use of

7 -- I mean the discharge of firearms?

8 A. You were supposed to report that, but if

9 it wasn't reported, you had no way of knowing. And

10 again, I don't know how you would know.

11 Q. Okay. So that would be no?

12 A. That would be an "I don't know."

13 Q. Okay. All right. I need five minutes,

14 and then I'm going to finish up. Give me five

15 minutes. I'll come right back, we'll finish it up.

16 THE REPORTER: Okay. We're off the

17 record. The time now is 1:04 p.m.

18 (WHEREUPON, a recess was taken.)

19 THE REPORTER: We're back on record. The

20 time now is 1:16 p.m.

21 BY MR. SHABAZZ:

22 Q. Okay. Mr. Godfrey, at the time of the

23 Michael Jenkins incident, you're familiar with the

24 term "chain of command"; correct?

25 A. Yes, sir.

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1 Q. Okay. How do you describe the chain of

2 command at the time of the Michael Jenkins incident?

3 Who was number one, two, three and four in the chain

4 of command?

5 A. Oh, number one's going to be the Sheriff.

6 Number two is going to be the Undersheriff. Number

7 three is going to be the --

8 Q. You're talking about Paul Holly?

9 A. There have been several undersheriffs

10 while I was there.

11 Q. Okay. But at the time of Jenkins?

12 A. Yep, yeah. Undersheriff Holly was not

13 there at that time. He was at the FBI National

14 Academy.

15 Q. Who was the Undersheriff at the time of

16 the Jenkins incident?

17 A. Paul Holly. But he was -- he was at a

18 school.

19 Q. But he was still second in the chain of

20 command?

21 A. Yes, sir.

22 Q. Okay. Quick question. Who was the

23 Undersheriff prior to Holly?

24 A. Oh geez. It would have been Randy, I

25 think.

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1 Q. Randy. What last name?

2 A. You would ask. I'm drawing a blank loss

3 right quick. It will come to me.

4 Q. How long did Randy serve, was Randy's

5 years of service?

6 A. 18 months maybe, on and off.

7 Q. One and a half. Do you know why he left?

8 A. I think he just got tired of everything.

9 He was -- this was a second career for him, just

10 like some of us. I think he --

11 Q. What did he get -- what did he get tired

12 of?

13 A. You'd have to ask him.

14 Q. Well, you said you thought he got tired.

15 Where did you get that thought from?

16 A. Well, just because when people retire,

17 it's when they get tired of doing what they're

18 doing.

19 Q. I mean but are you aware of anything that

20 he would have been tired of specifically?

21 A. The day-to-day operations of the Rankin

22 County Sheriff's Office, probably. It's a -- it's a

23 taxing job, especially Undersheriff. He handles

24 most of the purchasing and keeping up of equipment

25 and the hiring and the firing and all that kind of



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<p>1 stuff. So I'm sure he was pretty taxed. 2 Q. Okay. Now Randy served for 18 months. 3 Who was the Undersheriff before Randy? 4 A. Probably been McBroom, Kenton McBroom. 5 Q. Hold on a second. What was that name? 6 A. Ken McBroom. 7 Q. What, B-R like a broom? 8 A. M-C, capital B-R-O-O-M, yes sir. 9 Q. Ken McBroom. When did Ken McBroom serve 10 from? 11 A. A long time. He was Undersheriff when I 12 came there. Then he left, retired and came back on 13 a contract. So I can't -- I don't know the dates. 14 I just know he was in and out a lot. 15 Q. Is he still with Rankin County Sheriff's 16 Department right now? 17 A. I don't -- I don't know. 18 Q. Okay. Now before Mr. McBroom? 19 A. That would have been -- give me a second. 20 It will come to me. I'm going to look at my phone. 21 Can't look at my phone to pull up a personnel -- I 22 mean I don't have a personnel list. I just have it 23 in my phone. Raymond Duke, D-U-K-E. 24 Q. Raymond Duke. 25 A. Yes, sir.</p>	<p>Page 130</p> <p>1 Q. Okay. And civil rights and violations 2 also? 3 A. You didn't break them down by violation. 4 You just whoever. If it was your people involved, 5 you were in the chain of command for that. 6 Q. Okay. But it's just -- it's adequate to 7 describe McAlpin as third in the chain of command? 8 A. For the -- the investigators. If it would 9 have been a patrol officer, it would have been the 10 Patrol Chief Deputy. 11 Q. Okay. Now let's go back to the Goon Squad 12 coin. 13 A. Okay. 14 Q. Now did you ever discuss the existence of 15 the Goon Squad coin with Brian Bailey? 16 MR. DARE: Asked and answered. 17 THE DEPONENT: I've answered that once. 18 No. 19 BY MR. SHABAZZ: 20 Q. Okay. So who did you discuss the coin 21 with? 22 A. Really wasn't a topic of discussion. 23 Somebody would say "Hey, have you seen their coin" 24 and somebody'd say "Yeah, I've seen it. Yeah." 25 Like it wasn't -- it wasn't a big deal.</p> <p>Page 132</p>
<p>1 Q. Okay. Do you know when he began? 2 A. No, sir. And in fact he was after McBroom 3 and then McBroom came back. So there's a lot of 4 movement up in that office. I don't know dates. 5 Q. Okay. All right. Well, that's far enough 6 back for now. All right. Okay. At the time of the 7 Michael Jenkins incident, who was third in command? 8 A. Well, it wouldn't be a direct third. It 9 would be all your chief deputies would be under 10 that. And it would be -- it would be -- if you have 11 particular incident, it would be the Chief Deputy 12 who was in charge of whoever was involved in that 13 incident. 14 Q. Okay. How would you describe Brett 15 McAlpin? He was the Chief Investigative Officer, 16 right? 17 A. Right, yes. 18 Q. How do you describe him in the chain of 19 command? 20 A. If it was involved an investigator 21 investigation, I would assume he would be number 22 three. 23 Q. Okay. And that would be investigation 24 into use of force? 25 A. Yeah. Probably, yep.</p> <p>Page 131</p>	<p>1 Q. Okay. I mean was it -- was it limited to 2 the night shift, or was it -- was Goon Squad 3 applicable to other shifts? 4 A. No. It was that -- the coin was made for 5 McAlpin's shift. 6 MR. DARE: Middleton. 7 BY MR. SHABAZZ: 8 Q. Now how did -- well, you talked about 9 Middleton, you mean? 10 A. I'm sorry. 11 Q. Middleton. 12 A. Middleton, yes. I'm sorry. 13 Q. How did you -- how did you know it was 14 limited to Middleton's shift? 15 A. He said "Our shift had a coin made." 16 Q. That's what Middleton said to you? 17 A. Uh-huh. 18 MR. DARE: Yes? 19 MR. WALKER: Yes. 20 MR. SHABAZZ: Okay. 21 THE DEPONENT: Yes. I'm sorry. 22 BY MR. SHABAZZ: 23 Q. Okay. Now did you ask anybody else about 24 it? 25 A. No.</p> <p>Page 133</p>



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1 Q. Okay. But you said that you -- I think  
2 you said earlier that the coin was being passed out  
3 in the office?  
4 A. I just knew several people had it. I  
5 didn't mean they -- somebody was standing there on  
6 the corner passing them out one by one, no. They're  
7 generally traded. Coins are traded.  
8 Q. Tell me about that.  
9 A. I said coins are generally traded, any  
10 kind of coin. We have SRT coins, the Sheriff's  
11 Office had its own coin, and you would go to a  
12 function or go to a training event and you would  
13 trade coins with other people.  
14 Q. Okay. But who did you discuss the Goon  
15 Squad coin with?  
16 A. Nobody in particular.  
17 Q. Well, how did you know it was being passed  
18 around the office?  
19 A. Because I saw people with the coin.  
20 Q. Who?  
21 A. I don't remember. It was not a big deal,  
22 sir.  
23 Q. The existence of the Goon Squad coin was  
24 not a big deal to the department?  
25 A. No. There are coins all around.

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1 Q. Okay. Now what does -- what does "goon"  
2 mean? Do you know what goon means, what the goon in  
3 the Goon Squad means? Do you know?  
4 A. Yeah. If you --  
5 MR. DARE: You don't have to speculate.  
6 If you know, you can --  
7 MR. SHABAZZ: You're coaching him. How  
8 are you going to coach this man? Don't coach this  
9 man.  
10 THE DEPONENT: Sir, I'm 71 years old. I'm  
11 not being coached.  
12 MR. WALKER: He can -- he can answer based  
13 on his experience at the department.  
14 MR. DARE: If you know. If you know,  
15 answer.  
16 MR. SHABAZZ: Let him just man answer.  
17 You can't coach him.  
18 THE DEPONENT: I'll answer the question if  
19 you'll allow me to, sir. In general -- in general  
20 you would think --  
21 MR. SHABAZZ: What did the Goon Squad --  
22 what did the goon in this Goon Squad coin mean?  
23 What did goon mean?  
24 MR. DARE: Object to form.  
25 BY MR. SHABAZZ:

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1 Q. What did the "goon" mean?  
2 A. It's just his squad. It was a team-  
3 building thing for them.  
4 Q. Are you familiar with Lloyd Goon?  
5 A. With who?  
6 MR. WALKER: Lloyd Jones.  
7 THE DEPONENT: Lloyd Jones. I never met  
8 Mr. Jones. I know who he is.  
9 BY MR. SHABAZZ:  
10 Q. Do you he's -- have you heard -- do you  
11 know that he's known as Lloyd Goon Jones?  
12 A. I did not at that time. I've heard since  
13 then that that's -- that he was. I have no idea if  
14 that's where Middleton got the idea from.  
15 Q. Okay. Now goon. Now you say it's just  
16 the name of Middleton's shift, right?  
17 A. At that time, yes sir.  
18 Q. Okay. Now what does -- when you heard the  
19 name "goon," what did goon mean to you, though?  
20 A. Nothing in particular. The figures were  
21 just looked like little gangsters. They have hats  
22 on and suits.  
23 Q. They look like -- they look like  
24 gangsters?  
25 A. They look like a 30's guy, fedora hat,

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1 little suit and they had their hands in their  
2 pockets, as I remember.  
3 Q. Now did that strike you at all that  
4 Sheriff deputies were calling themselves goons?  
5 A. Not particularly. I've seen -- I've seen  
6 challenge coins with skulls and crossbones and  
7 everything else on them. I mean it's just what you  
8 picked.  
9 Q. Does the department allow deputies to use  
10 other insignia besides approved department insignia?  
11 A. After that happened, I think they issued a  
12 prohibition, and there may have been one before  
13 that. I don't remember.  
14 Q. Okay. Tell me about the one before that.  
15 A. We had SRT coins made that had the  
16 Sheriff's Office badge on one side and the SRT patch  
17 on the other side.  
18 Q. Okay. So what -- tell me about the  
19 prohibition? What happened with the prohibition?  
20 A. That you could not use a Sheriff's Office  
21 patch without our insignia without approval from the  
22 Sheriff.  
23 Q. This was ahead of the Jenkins incident?  
24 A. This was -- I think this was after.  
25 Q. Okay, okay.



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1 A. Because I don't think it had really  
2 occurred before. I mean as far as being  
3 controversial or anything.  
4 Q. Yeah. But beforehand. So you said there  
5 was a prohibition beforehand on --  
6 A. I'm not sure. I'm not sure when the  
7 prohibition was issued. I just know that they came  
8 out one day. I think it came from Holly, that you  
9 cannot use the Sheriff's Office badge or patch  
10 unless approved by management.  
11 Q. Okay. Now how did you -- now how did you  
12 know that the Goon Squad was just limited to  
13 Middleton's shift?  
14 A. Because they said this was our shift.  
15 Q. Okay. Who's the "they"?  
16 A. Middleton. I've answered this several  
17 times.  
18 Q. You said "they." Middleton's a single  
19 individual. You said "they." Who's the they?  
20 A. Middleton.  
21 Q. Yeah. But did you discuss the Goon Squad  
22 coin with anyone other than Middleton?  
23 A. It was not a topic of discussion.  
24 Somebody said "Hey, have you seen the coin  
25 Middleton's team, our squad got?" Yeah. I said

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1 yeah, I got one. He gave me one, and that was it.  
2 Q. Okay. And so -- I mean how did you know  
3 it was just limited to the night shift? Did you  
4 just draw that conclusion or did somebody spell that  
5 out to me?  
6 A. Middleton told me "Here's our coin."  
7 Q. Okay. So what are you saying? You just  
8 made an assumption that it was just on his shift?  
9 A. Yeah. I would -- that would be a good --  
10 that would be a good assumption that I assumed, yes  
11 sir.  
12 Q. You didn't follow up?  
13 A. What was there to follow up on?  
14 Q. Follow up on the existence of a sub-  
15 organization in the department that soon thereafter  
16 went on to commit heinous crimes.  
17 MR. DARE: Object to -- was that a  
18 question? Can you ask the question again?  
19 MR. SHABAZZ: I submitted the question. I  
20 asked him.  
21 MR. DARE: No. You made a statement.  
22 MR. SHABAZZ: He said "Follow up as to  
23 what?" I answered it for him.  
24 MR. DARE: Okay. So do you have a  
25 question on the table?

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1 MR. SHABAZZ: This is my deposition, sir.  
2 MR. DARE: Sure. Ask a question.  
3 BY MR. SHABAZZ:  
4 Q. Okay. Now who -- in terms of the  
5 discharge of weapons, was there a person in charge  
6 of -- of checking the deputy's weapons and their  
7 bullets and not, checking their firearms and their  
8 amount of ammunition before they went out on patrol?  
9 A. No.  
10 Q. Okay. And was there a procedure when they  
11 returned, to check their weapons to see whether or  
12 not their weapons had been discharged?  
13 A. No.  
14 Q. Okay. Okay. So your -- the system in  
15 Rankin County was just based on trust?  
16 A. In 48 years of --  
17 Q. No one --  
18 A. In 48 years of law enforcement, I know of  
19 no agency that checks any officer's weapon before  
20 the shift and after the shift personally. I have no  
21 knowledge of that. Never heard of it.  
22 Q. And if it existed, would you be surprised?  
23 A. Yes.  
24 Q. Okay. Okay. So an officer in Rankin  
25 County can discharge his weapon any number of times,

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1 and when he returns no one checks; is that correct?  
2 A. When I was there, no you didn't check  
3 every night. No, or every morning or whenever they  
4 came in. No.  
5 Q. I mean did that policy change?  
6 A. I have no idea.  
7 Q. Did it change while you were there?  
8 A. No. There never was a policy.  
9 Q. Okay. So as of this point, the officer  
10 can -- can go in the field and fire off 12 rounds,  
11 and no system is in place to check whether or not  
12 that officer has discharged rounds?  
13 A. I think I've --  
14 MR. DARE: Is there a question?  
15 BY MR. SHABAZZ:  
16 Q. Is that the system in Rankin County?  
17 A. I think I've answered that. I know of no  
18 agency that does that.  
19 Q. I'm talking about this one. Forget the  
20 other ones. This one.  
21 A. Well, I think this one would be included  
22 in "no agency."  
23 Q. I'm just talking about this one, because  
24 we're not giving opinions on other ones.  
25 A. No.



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1 Q. We're talking about Rankin. There is no  
2 system in place?  
3 A. No.  
4 THE REPORTER: I need to remind you two to  
5 please speak one at a time, so I can record more  
6 clearly.  
7 MR. SHABAZZ: Okay. All right. All  
8 right. I have no further questions.  
9 THE DEPONENT: Excellent.  
10 EXAMINATION  
11 BY MR. DARE:  
12 Q. I have just a handful of follow-ups.  
13 Earlier in your deposition, you made reference to a  
14 DT training. What does the DT stand for?  
15 A. Defensive tactics.  
16 Q. And what generally is a defensive tactics  
17 training?  
18 A. It's depending on what style your  
19 particular officer chooses, it could be a Gracie  
20 jujitsu style, it could be just some standard  
21 handcuffing techniques. Generally, what it starts  
22 as, the basic handcuffing techniques. It will  
23 expand to taser use. It could expand to use of  
24 baton, less than lethal force, grappling techniques.  
25 It could be one of a number of different things.

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1 Q. Based on your knowledge of training  
2 requirements on or prior to January of 2023, what  
3 did the state require of Sheriff's Department  
4 deputies as far as annual training, the state of  
5 Mississippi?  
6 A. None.  
7 Q. You were also asked about investigations  
8 into the Damien Cameron incident. Did I understand  
9 you correctly that you don't recall investigations  
10 by the name of the individual, is that right?  
11 A. Now is that the investigation with Elward?  
12 Q. So I'm going to represent to you that  
13 Damien Cameron was the individual who was  
14 unconscious in the back of Hunter Elward's vehicle.  
15 A. Yeah. I know what you're talking about.  
16 Q. And later died in a -- in a hospital.  
17 A. Right.  
18 Q. Did you ever interview Hunter Elward  
19 following the Damien Cameron incident?  
20 A. Officially, no.  
21 Q. Did you speak with him about the incident?  
22 A. Yes. I asked him what happened one time.  
23 In general, any time somebody was involved in any  
24 kind of altercation, I would ask them what happened  
25 just for knowledge. Perhaps there's a chance to add

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1 into future training or seek proper training out.  
2 Q. I think you testified to this, and I want  
3 to make sure. Now OIS is what?  
4 A. Officer-involved shooting.  
5 Q. And during your time at the Rankin County  
6 Sheriff's Department, how were OISs investigated, if  
7 the OIS occurred -- if a deputy with the Rankin  
8 County Sheriff's Department was involved in the OIS?  
9 A. When I first got there, I remember the  
10 first one or two I think were probably investigated  
11 internally. And after that, they started assigning  
12 them to MBI. And I -- I can't give you a specific  
13 date or time that MBI started doing.  
14 There were -- when I first got there, they  
15 were very rare. They were very rare when I first  
16 started there, because I remember the first one  
17 after I started there. It had been the first one  
18 they'd had in years.  
19 Q. To your knowledge, was it a requirement  
20 that MBI investigate OISs for Sheriff's Departments?  
21 A. Not to my knowledge. I don't know.  
22 MR. DARE: Tender the witness back to you,  
23 counsel.  
24 FURTHER EXAMINATION  
25 BY MR. SHABAZZ:

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1 Q. Okay. So you were not the Internal  
2 Affairs officer for Rankin County at the -- at any  
3 time, Internal Affairs officer for Rankin County at  
4 any time?  
5 A. We didn't have Internal Affairs officer  
6 when I was there.  
7 Q. Oh. And you weren't the person  
8 responsible for investigating allegations of -- of  
9 violations of department policy by the deputies in  
10 Rankin, were you?  
11 A. Not unless the Sheriff asked me to look  
12 into a particular matter.  
13 Q. Okay. And that occurred rarely? I mean  
14 just on sporadic occasions?  
15 A. It was pretty rare, yes sir.  
16 Q. Okay. Did you -- just on investigations,  
17 did you investigate the use of force at the  
18 Sheriff's Office? Did you investigate the use of  
19 force by a gentleman by the name of Christopher  
20 Mack, who in 2021 claims that he was beaten in the  
21 jail by Rankin deputies? Early and either between  
22 January and May of 2021? Christopher Mack claimed  
23 he was beaten by a deputy at Rankin Jail. Are you  
24 familiar with that?  
25 MR. DARE: I'm going to object to the --



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1 at least to the extent it's beyond the scope of  
2 cross. But you can answer.  
3 THE DEPONENT: Not to my knowledge. I  
4 don't really remember.  
5 BY MR. SHABAZZ:  
6 Q. Have you ever investigated any matter  
7 involving a gentleman by the name of Christopher  
8 Mack?  
9 A. Doesn't ring a bell.  
10 MR. SHABAZZ: All right. Thank you so  
11 much.  
12 THE REPORTER: All right.  
13 MR. SHABAZZ: I'm done.  
14 THE REPORTER: Okay. Before we go off  
15 record, counsel would you like to order an original,  
16 Mr. Shabazz, of the transcript?  
17 MR. SHABAZZ: Yes, ma'am, I would. Well,  
18 I'll take it electronically right now, yes. I'll  
19 take it electronically.  
20 THE REPORTER: Yeah, that's perfect.  
21 Okay.  
22 MR. SHABAZZ: That's all I want.  
23 MR. DARE: And we will read and sign. You  
24 can send it -- you can send the copy just to me, and  
25 I'll get the read and sign, via email. Yes, over to

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CERTIFICATE

1  
2  
3 I, Nicole Smith, do hereby certify that I  
4 reported all proceedings adduced in the foregoing  
5 matter and that the foregoing transcript pages  
6 constitutes a full, true and accurate record of said  
7 proceedings to the best of my ability.  
8  
9 I further certify that I am neither  
10 related to counsel or any party to the proceedings  
11 nor have any interest in the outcome of the  
12 proceedings.  
13  
14 IN WITNESS WHEREOF, I have hereunto set my  
15 hand this 15th day of November, 2024.  
16  
17   
18  
19  
20 Nicole Smith  
21  
22  
23  
24  
25

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1 --  
2 MR. WALKER: All right. Thank you.  
3 THE REPORTER: Anything else? Off record.  
4 The time now is 1:38 p.m.  
5 (WHEREUPON, the deposition of STEVEN N.  
6 GODFREY was concluded at 1:38 p.m.)  
7  
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CORRECTION SHEET

1 Deposition of: Steven N. Godfrey Date: 11/11/24  
2 Regarding: Jenkins vs. Rankin County  
3 Reporter: Smith/Seaman/Holmes  
4  
5  
6 Please make all corrections, changes or  
7 clarifications to your testimony on this sheet,  
8 showing page and line number.  
9 If there are no changes, write "none" across the  
10 page. Sign this sheet and the line provided.  
11 Page Line Reason for Change  
12 \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
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21 \_\_\_\_\_  
22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 Signature: \_\_\_\_\_  
25 Steven N. Godfrey



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<p>1 Date: 11/11/2024 Assignment #: 79776 Page 150</p> <p>2 Deponent: Steven N. Godfrey</p> <p>3 Case: MICHAEL COREY JENKINS vs . RANKIN COUNTY</p> <p>4</p> <p>5 ATTORNEY - TRANSCRIPT ENCLOSED:</p> <p>6 signature of your client is required. Please have your client</p> <p>7 make any corrections necessary. Sign the Correction Sheet</p> <p>8 where indicated. Forward a COPY of the executed Correction</p> <p>9 Sheet directly to the attorney(s) listed below. (The Address(es)</p> <p>10 can be found on the Appearance page of the deposition.) Also,</p> <p>11 send a COPY of the executed Correction Sheet to our corporation.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 C C:Naegeli Deposition and Trial</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	
<p>1 DECLARATION Page 151</p> <p>2 Deposition of: Steven N. Godfrey Date: 11/11/2024</p> <p>3 Regarding: MICHAEL COREY JENKINS vs . RANKIN COUNTY</p> <p>4 Reporter: Nicole Smith</p> <p>5 _____</p> <p>6</p> <p>7 I declare under penalty of perjury the following to be</p> <p>8 true:</p> <p>9</p> <p>10 I have read my deposition and the same is true and</p> <p>11 accurate save and except for any corrections as made</p> <p>12 by me on the Correction Sheet herein.</p> <p>13</p> <p>14 Signed at _____,</p> <p>15 on the _____ day of _____, 20____.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 Signature: _____</p> <p>25 Steven N. Godfrey</p>	

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